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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

2021 DODGE DURANGO UTILITY SRT  
HELLCAT, VIN: 1C4SDJH99MC757148,  
LICENSE NUMBER: 8YGP548,

Defendant.

VERIFIED COMPLAINT FOR  
FORFEITURE *IN REM*

The United States of America, by and through its undersigned attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions:

**NATURE OF ACTION**

1. This is a civil action in rem to forfeit to the United States a Dodge Durango Utility SRT Hellcat, VIN: 1C4SDJH99MC757148, License Number: 8YGP548 (hereafter “defendant vehicle”) involved in violations of federal drug laws.

2. The defendant vehicle was seized from a residence connected to Sukhmanpreet Jawanda (“Jawanda”) on May 12, 2022, during the execution of a federal search warrant at 7642 Redhill Way, Browns Valley, California. The defendant vehicle is registered to Joseph Lee Edward Wright (“Wright”). The defendant vehicle is in the custody of the U.S. Marshals Service, Eastern District of

California.

### **JURISDICTION AND VENUE**

3. This action is brought by the United States of America pursuant 21 U.S.C. §§ 881(a)(4) and (a)(6), seeking the forfeiture of a defendant vehicle involved in illegal drug activity.

4. This Court has jurisdiction over an action commenced by the United States under Title 28, United States Code, Section 1345, over an action for forfeiture under Title 28, United States Code, Section 1355(a), and over this particular action under Title 21, United States Code, Section 881.

5. This district is a proper venue pursuant to Title 28, United States Code, Section 1355, because the acts giving rise to this *in rem* forfeiture action occurred in this district, and pursuant to Title 28, United States Code, Section 1395, because the defendant vehicle was seized in this district.

### **FACTUAL ALLEGATIONS**

6. In late 2021 or early 2022, law enforcement received information that Jawanda and others were trafficking illegal drugs and firearms in Northern California. In 2022, law enforcement engaged in a series of controlled buys of illegal firearms and narcotics from Jawanda that culminated in federal search warrants at Jawanda's home and other locations linked to his illegal activity. The early 2022 controlled buys included:

- i. On January 11, 2022, an undercover officer ("UC") conducted a controlled buy of a polymer 80 semi-automatic Glock 43 style 9mm handgun from Jawanda. Law enforcement observed Jawanda drive a 2021 Dodge Charger (not the defendant vehicle) in Yuba City where he met the UC. At the meet, the UC got into the 2021 Dodge Charger and purchased the Glock handgun with a suppressor attached for \$1,000 from Jawanda.
- ii. On February 17, 2022, the UC negotiated the purchase of approximately 2,560 counterfeit oxycodone blue M30 pills containing fentanyl for \$5,000 from Jawanda. Law enforcement observed Jawanda drive the defendant vehicle from Sacramento to the meet location in Natomas, park next to the UC, and then enter the right front passenger seat of the UC's vehicle. Jawanda sold the UC a large quantity of counterfeit oxycodone tablets and then exited the UC's vehicle and

drove away. As explained below, law enforcement has determined that Jawanda and Wright traveled to Oregon in February 2022 to purchase the defendant vehicle for over \$80,000 in cash, and Jawanda drove the defendant vehicle back to the meet with the UC to complete the drug transaction.

7. On March 25, 2022, the California Highway Patrol conducted a traffic stop of a GMC Sierra Truck driven by Jawanda in Stockton, California. During a search of the GMC Truck, law enforcement found approximately 30,000 counterfeit oxycodone pills containing fentanyl, approximately one kilogram of cocaine, and a loaded semi-automatic handgun.

8. On May 12, 2022, federal agents executed a search warrant at a residence associated with Jawanda in Browns Valley, California. During the search of this property, law enforcement found two bags containing gram-quantities of methamphetamine and cocaine, respectively, three bags containing counterfeit oxycodone M30 pills containing fentanyl, approximately 94 suspected marijuana plants, a black rifle with an attached drum style magazine, and the defendant vehicle.

9. On May 12, 2022, federal agents also searched a second residence associated with Jawanda, located on 8<sup>th</sup> Avenue in Sacramento, and found approximately 1068 counterfeit oxycodone M30 pills containing fentanyl.

10. On April 20, 2023, an Indictment was filed in the Eastern District of California charging Jawanda with two counts of Distribution of Fentanyl in violation of 21 U.S.C. § 841(a)(1), Possession with Intent to Distribute Fentanyl in violation of 21 U.S.C. § 841(a)(1), Possession with Intent to Distribute Cocaine in violation of 21 U.S.C. § 841(a)(1), and Unlawful Dealing in Firearms Without a License in violation of 18 U.S.C. § 922(a)(1)(A).

11. On December 7, 2023, Jawanda pleaded guilty to federal drug charges and, on August 1, 2024, was sentenced to 120 months in federal prison.

12. Law enforcement investigated the purchase of the defendant vehicle and learned that Jawanda and Wright purchased it from an individual in the state of Oregon in February 2022. According to Oregon Department of Motor Vehicle (“DMV”) records, the vehicle was sold to a “Joseph Edward” with an address of 6024 Albert’s Avenue Apt 33, but no city listed. Written on the back of the vehicle’s bill of sale was “Jawanda Sukhmanpreet” and Jawanda’s California Driver’s License number.

13. According to California DMV records, the defendant vehicle was registered at the Colusa County DMV on February 16, 2022, to “Joseph Wright.” The address listed for the vehicle’s registration was 6024 Alberta Ave., Apt 33, Marysville, California.

14. Law enforcement interviewed the seller of the defendant vehicle and showed them pictures of Wright and Jawanda. The seller confirmed they were the buyers. The seller told law enforcement that he posted the vehicle on an auto selling website and that both Wright and Jawanda met him in Oregon to complete the transaction. To complete the financial piece of the exchange, Wright and Jawanda pulled from their pockets more than \$80,000 in cash.

15. Law enforcement interviewed Wright in Reno, Nevada regarding the purchase/sale of the defendant vehicle and showed Wright a photo of Jawanda, which Wright positively identified as “Manny” (a known nickname for Jawanda) who purchased the defendant vehicle from Wright for \$1,600 cash in Marysville, California; Wright denied traveling to Oregon to purchase the defendant vehicle with Jawanda.

16. According to the California Employment Development Department, there are no records of employment for Jawanda from the start of 2021 through June 2022.

**FIRST CLAIM FOR RELIEF**  
**21 U.S.C. § 881(a)(4)**

17. Paragraphs one through sixteen above are incorporated by reference as though fully set forth herein.

18. The defendant vehicle is subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(4), because it was used or was intended to be used to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of a controlled substance in violation of 21 U.S.C. §§ 841, *et seq.*, an offense punishable by more than one year’s imprisonment.

**SECOND CLAIM FOR RELIEF**  
**21 U.S.C. § 881(a)(6)**

19. Paragraphs one through sixteen above are incorporated by reference as though fully set forth herein.

20. The defendant vehicle is subject to forfeiture to the United States pursuant to 21 U.S.C. §

881(a)(6), because it represents proceeds traceable to violations of 21 U.S.C. §§ 841 *et seq.*, an offense punishable by more than one year's imprisonment.

**PRAYER FOR RELIEF**

WHEREFORE, the United States prays that:

1. Process issue according to the procedures of this Court in causes of action *in rem*;
2. Any person having an interest in said defendant vehicle be given notice to file a claim and to answer the complaint;
3. The Court enter a judgment of forfeiture of the defendant vehicle to the United States; and
4. The Court grant such other relief as may be proper.

Dated: 9/25/2024

PHILLIP A. TALBERT  
United States Attorney

By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

**VERIFICATION**

I, Matthew T. Clayton, hereby verify and declare under penalty of perjury that I am a Special Agent with the Drug Enforcement Administration, that I have read the foregoing Verified Complaint for Forfeiture *In Rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to the best of my knowledge and belief.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, including information supplied to me by other law enforcement officers, as a Special Agent with the Drug Enforcement Administration.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated: 09/25/2024

/s/ Matthew T. Clayton  
MATTHEW T. CLAYTON  
Special Agent  
Drug Enforcement Administration  
  
(Signature retained by attorney)